

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JAYSUKH RUDANI, Individually And On  
Behalf Of All Others Similarly Situated,

Plaintiff,

v.

IDEANOMICS, INC. f/k/a SEVEN STARS  
CLOUD GROUP, INC. f/k/a WECAST  
NETWORK, INC., ZHENG WU a/k/a BRUNO  
WU, BING YANG, and ROBERT BENYA,

Defendants.

No: 1:19-cv-06741-GBD

**NOTICE OF LEAD PLAINTIFF'S MOTION FOR FINAL APPROVAL  
OF CLASS ACTION SETTLEMENT**

PLEASE TAKE NOTICE that on January 25, 2022 at 10:00 a.m., at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, Lead Plaintiff Jaysukh Rudani ("Lead Plaintiff"), on behalf of himself and the putative Class,<sup>1</sup> will and hereby does respectfully move this Court for an Order pursuant to Rule 23(e) of the Federal Rules of Civil Procedure: (a) granting final approval of the proposed Settlement of the above-captioned securities class action lawsuit (the "Action"); (b) finding that the notice program fully satisfied the requirements of Federal Rule of Civil Procedure 23(e), the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4(a)(7), and the requirements of due process; (c) finding that the proposed Plan of Allocation is fair, reasonable, and adequate; (d) granting final certification of the Class for

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<sup>1</sup> Unless otherwise noted, all capitalized terms have the meaning ascribed to them in the Stipulation of Settlement dated July 30, 2021 ("Stipulation"), ECF No. 107.

settlement purposes; and (e) granting final appointment of Lead Plaintiff as Class Representative for the Class and Faruqi & Faruqi, LLP as Class Counsel for settlement purposes.

This motion is based upon the accompanying Memorandum of Law in Support of Lead Plaintiff's Motion for Final Approval of the Class Action Settlement; the Declaration of Katherine M. Lenahan in Support of Lead Plaintiff's Motion for Final Approval of the Class Action Settlement and Lead Counsel's Motion for an Award of Attorneys' Fees and Expenses, and all related exhibits; and the Declaration of Tina Chiango Regarding: (A) Dissemination of Notice to the Class; (B) Publication of the Summary Notice; and (C) Report on Requests for Exclusion and Objections, and all related exhibits; the pleadings and records on file, and other such matters and argument as the Court may consider at the hearing of this motion.

Dated: November 29, 2021

Respectfully submitted,

By: /s/ Katherine M. Lenahan  
Katherine M. Lenahan

Katherine M. Lenahan  
Megan M. Remmel  
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*Attorneys for Lead Plaintiff Jaysukh Rudani*